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May 21, 2012

BY ELECTRONIC COURT FILING

The Hon. Paul S. Diamond  
United States District Court for the  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

**The Abi Jaoudi and Azar Trading Corp. v. CIGNA Worldwide Insurance Co.  
Index No. 91-6785**

Dear Judge Diamond:

As counsel to Cigna Worldwide Insurance Co. (“CWW”) we would like to clarify what may be a misunderstanding an issue concerning the caption of CWW’s Amended Emergency Motion for Contempt and to Enforce the Court’s Anti-Suit Injunction Order, dated April 26, 2012, and filed May 10, 2012 (the “Amended Motion”).

The Amended Motion that CWW filed last month was an amendment to the original “emergency motion” filed by CWW four years ago, on November 18, 2008 (*Doc. No. 174*), at a time when imminent proceedings brought by certain of the Respondents in the Cayman Islands courts created an urgent need for this Court’s intervention. The Amended Motion identifies five nonparty respondents whose identities were unknown in 2008 and who were accordingly named as “Doe” respondents in the November 18, 2008 motion. Because the Amended Motion (which identifies respondents whose identities were unknown in 2008) was not a new motion, but merely an amendment to the existing motion, we maintained the original caption, including the term “Emergency.”

We now appreciate that the inclusion of that term in the caption suggested that the new filing also addressed an emergency and therefore required prompt action. While CWW has every intention vigorously to pursue the Motion for Contempt, we did not intend to suggest that the present motion needed to be addressed on an emergent basis, and we apologize to the Court for any inconvenience caused.

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Finally, we note that CWW joined in the respondents' request for extra time to respond to CWW's Amended Motion both as a professional courtesy and as part of an agreement by which counsel for Mr. Little agreed to accept service of the Amended Motion for Mr. Little, which we had not to that point been able to accomplish.

Respectfully submitted,

/s/ Donald W. Hawthorne  
Donald W. Hawthorne

cc:     Henry F. Reichner, Esq.  
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